

5. At all times relevant herein, Global Wealth Investments, LLC, (hereinafter "Global Wealth") was registered as a limited liability company with the State of Missouri. Global Wealth was associated with GPGW and used common personnel and facilities. GPGW represented Global Wealth to be a private investment firm and subsidiary of GPGW.

6. At all times relevant herein, Global Wealth Investment Group, LLC, (hereinafter "Global Wealth Investment Group") was registered as a limited liability company with the State of Missouri. Global Wealth Investment Group was associated with GPGW and used common personnel and facilities.

7. At all times relevant herein, GPGW maintained bank accounts at several financial institutions, whose moneys, funds, assets, and accounts were insured by the Federal Deposit Insurance Corporation ("FDIC"), including the following financial institutions:

- A. NetBank
- B. U.S. Bank
- C. Wachovia Bank

8. At all times relevant herein, **ANDRE MITCHELL** maintained and had access to accounts at Scott Credit Union and USAA Federal Savings Bank.

9. At all times relevant herein, **ANDRE MITCHELL** and **HENRY ALLEN** were principal officers of GPGW and represented themselves to investors as officers of GPGW.

10. At all times relevant herein, **ANDRE MITCHELL** held the titles of president and chief executive officer for GPGW.

11. At all times relevant herein, **HENRY ALLEN** held the titles of vice president and chief operating officer for GPGW. **HENRY ALLEN** was an organizer and registered agent of

Opportunity Lives. **HENRY ALLEN** was a registered agent of Global Wealth Investment Group.

12. Beginning no later than in or around July 2004, the exact date being unknown, and continuing until in or around December 2005, within the Eastern District of Missouri and elsewhere,

ANDRE MITCHELL, and
HENRY ALLEN,

the defendants herein, did voluntarily and intentionally devise and participate in a scheme to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

13. In general, the scheme to defraud operated as a pyramid scheme in which pay outs to earlier investors were made with funds obtained from subsequent investors rather than from legitimate investments. This approach created a false appearance of a valid investment strategy, which had the effect of luring investors to make additional payments to the defendants.

14. Many of the persons who "invested" in GPGW were never paid any return on their investment and were never repaid their principal investment.

15. As part of the scheme to defraud, **ANDRE MITCHELL** and **HENRY ALLEN** would arrange for prior investors to give testimonials to potential investors regarding the returns they had received from GPGW, when **ANDRE MITCHELL** and **HENRY ALLEN** knew that such prior investors had not been paid using returns from legitimate investments.

16. As part of the scheme to defraud, **ANDRE MITCHELL** and **HENRY ALLEN** would falsely and fraudulently represent to investors and potential investors that GPGW and its related business entities had purchased real estate, and were using investor funds to purchase real

estate in and around the area of St. Louis, Missouri. In or around late 2004, **ANDRE MITCHELL** falsely and fraudulently represented that GPGW was making large profits by buying, rehabilitating, and selling properties in the St. Louis, Missouri, area and elsewhere. In many cases, **ANDRE MITCHELL** falsely and fraudulently promised investors that they would receive 600% returns on their investments within six months.

17. As part of the scheme to defraud, **ANDRE MITCHELL**, **HENRY ALLEN**, and others associated with GPGW solicited investments using a variety of means, including "invitation only" and "private investment" offerings which were published in private placement memoranda. The private placement memoranda included false, fraudulent, and misleading information, including information regarding the uses to which investor funds would be put, the security of the principal funds provided by investors, and the expected rates of return. In some cases, the private placement memoranda were entitled as "Private Investment Offerings".

18. As part of the scheme to defraud, **ANDRE MITCHELL** and **HENRY ALLEN** routinely delivered promissory notes, including by U.S. Mail, to persons who had invested money in GPGW and its associated businesses. These promissory notes falsely and fraudulently represented the rate of return and pay schedule.

19. As part of the scheme to defraud, **ANDRE MITCHELL** and **HENRY ALLEN** would travel to meet with investors and potential investors. In some cases, **ANDRE MITCHELL** and **HENRY ALLEN** would arrange for and host "money parties" for investors and potential investors.

20. As part of the scheme to defraud, and to present a fraudulent image of success, **ANDRE MITCHELL** and **HENRY ALLEN** arranged and hosted travel events for certain GPGW investors, including a Cruise.

21. As part of the scheme to defraud, **ANDRE MITCHELL** and **HENRY ALLEN** would invite investors and potential investors to meet with them in the Eastern District of Missouri.

22. As part of the scheme to defraud, **ANDRE MITCHELL** and **HENRY ALLEN** provided false and fraudulent reports to investors and potential investors regarding the status of real estate projects allegedly undertaken by GPGW and its related business entities, including reports that falsely and fraudulently represented that certain properties had been purchased and resold for a profit, when in truth and in fact, no such properties had been purchased and resold by GPGW and any of its associated business entities.

23. As part of the scheme to defraud, **ANDRE MITCHELL** and **HENRY ALLEN** organized and conducted a "house tour" during which investors and potential investors were shown locations in the St. Louis, Missouri, area which represented areas in which GPGW and its associated companies had purchased real estate, when in truth and in fact, as **ANDRE MITCHELL** and **HENRY ALLEN** then knew, GPGW and its affiliated companies had not purchased any such real estate.

24. As part of the scheme to defraud, **ANDRE MITCHELL** and **HENRY ALLEN** would routinely receive funds from investors and deposit those funds into one of GPGW's bank accounts. In some cases, **ANDRE MITCHELL** and **HENRY ALLEN** directed investors to wire transfer funds directly to a GPGW bank account.

25. As part of the scheme to defraud, **ANDRE MITCHELL** would sometimes transfer investor funds from a GPGW account at NetBank to a personal checking account at Scott Credit Union.

26. As part of the scheme to defraud, **HENRY ALLEN** would sometimes transfer investor funds from one GPGW account to another GPGW account. **HENRY ALLEN** also purchased cashier's checks and official checks and withdrew large sums of cash.

27. As part of the scheme to defraud, **ANDRE MITCHELL** and **HENRY ALLEN** did not use investor funds for the purposes promised and represented. Rather, investor funds were routinely paid to **ANDRE MITCHELL**, **HENRY ALLEN**, their relatives, persons associated with GPGW, and to some prior investors.

28. As part of the scheme to defraud, money paid by investors of Opportunity Lives was used to pay investors of GPGW.

29. As part of the scheme to defraud, **ANDRE MITCHELL** and **HENRY ALLEN** paid investors with checks drawn on accounts with insufficient funds to cover those checks.

30. As part of the scheme to defraud, **ANDRE MITCHELL** and **HENRY ALLEN** issued a Private Investment Offering covering October 15, 2004 to December 15, 2004, which solicited investment in a variety of notes, and falsely and fraudulently represented that investor principal "remains secured through a high yield corporate bond program" and that the "only thing ever at risk is the interest." This Private Investment Offering also requested investors to deliver their investments by wire transfer or by overnight or certified mail.

31. As part of the scheme to defraud, **ANDRE MITCHELL** and **HENRY ALLEN** issued a Private Investment Offering covering December 31, 2004 to February 25, 2005, which solicited investment in a variety of notes, and falsely and fraudulently represented that investor principal "remains secured through a high yield corporate bond program" and that the "only thing ever at risk is the interest." This Private Investment Offering also requested investors to deliver their investments by wire transfer or by overnight or certified mail.

32. As part of the scheme to defraud, **ANDRE MITCHELL** and **HENRY ALLEN** issued Private Placement Memorandum # CA-020105B, which falsely and fraudulently represented that proceeds of the offering would be used to purchase real property. Private Placement Memorandum # CA-020105B also falsely and fraudulently represented that investor principal would be "secured through a high yield corporate bond program" and that the "only thing ever at risk is the interest."

33. As part of the scheme to defraud, **ANDRE MITCHELL** and **HENRY ALLEN** falsely represented and caused to be represented to an investor referred to herein as "JW" that GPGW had bought and sold properties, yielding large profits, and that GPGW never missed a return payment to any investor.

34. As part of the scheme to defraud, in reliance on information provided by **ANDRE MITCHELL** and **HENRY ALLEN**, numerous investors, including JW, made substantial investment payments to GPGW, including investments paid by wire transfer. JW was never repaid any of the money he paid to GPGW.

35. As part of the scheme to defraud, **ANDRE MITCHELL** and **HENRY ALLEN** did not invest the payments made by investors, including JW, as promised but rather diverted investment payments, including using investment payments of JW, to pay themselves and other GPGW investors.

MAIL FRAUD

36. As part of the scheme to defraud, **ANDRE MITCHELL** and **HENRY ALLEN** mailed and caused to be delivered by mail several promissory notes to JW.

37. On or about the dates listed below, in the Eastern District of Missouri and elsewhere,

**ANDRE MITCHELL, and
HENRY ALLEN,**

defendants herein, having voluntarily and intentionally devised and participated in a scheme to defraud and to obtain money by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing this scheme and in attempting to do so, did knowingly send and cause to be sent and delivered by the United States Postal Service from St. Louis, Missouri, to JW in California, a series of promissory notes signed by **HENRY ALLEN** as Vice President of GPGW.

<u>COUNT</u>	<u>DATE</u>	<u>NOTE</u>
ONE	February 28, 2005	\$50,000 principal amount
TWO	March 3, 2005	\$5,000 principal amount
THREE	March 14, 2005	\$50,000 principal amount
FOUR	May 25, 2005	\$25,000 principal amount

In violation of Title 18, United States Code, Sections 1341 and 2.

COUNTS FIVE - EIGHT

The Grand Jury further charges:

1. The Grand Jury realleges and incorporates by reference herein paragraphs 1 through 36 of Count One.

WIRE FRAUD

2. Between in or around March 2005 and in or around June 2005, JW originated and caused to be sent numerous interstate wire transfers of funds from California to a GPGW account at U.S. Bank, in St. Louis Missouri.

3. On or about the dates listed below, in the Eastern District of Missouri and elsewhere,

**ANDRE MITCHELL, and
HENRY ALLEN,**

defendants herein, having voluntarily and intentionally participated in a scheme to defraud and to obtain money by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing this scheme and in attempting to do so, did knowingly cause to be transmitted in interstate commerce by wire certain writings, signs, signals, pictures or sounds, namely the following wire transfers from a Pentagon Credit Union account, originated in California, to GPGW's U.S. Bank account in St. Louis, Missouri:

<u>COUNT</u>	<u>DATE</u>	<u>TRANSFER</u>
FIVE	March 2, 2005	\$55,000
SIX	March 29, 2005	\$88,000
SEVEN	April 29, 2005	\$50,000
EIGHT	June 1, 2005	\$5,000

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNTS NINE - ELEVEN

The Grand Jury further charges:

1. The Grand Jury realleges and incorporates by reference herein paragraphs 1 through 36 of Count One.

MONEY LAUNDERING

2. After funds invested by JW were wire transferred into a GPGW account at U.S. Bank, those investment funds were co-mingled with other funds and thereafter withdrawn in the

form of official U.S. Bank checks made payable to third parties and were not invested as promised.

3. On or about the dates listed below, in the Eastern District of Missouri,

**ANDRE MITCHELL, and
HENRY ALLEN,**

defendants herein, did knowingly engage and attempt to engage in monetary transactions in and affecting interstate commerce, and involving the use of financial institutions which were engaged in the activities which affected interstate commerce, in criminally derived property of a value greater than \$10,000 and said property having been derived from specified unlawful activity, that is, mail fraud in violation of Title 18, United States Code, Section 1341, and wire fraud in violation of Title 18, United States Code, Section 1343, said monetary transactions being further described as follows:

<u>COUNT</u>	<u>DATE</u>	<u>TRANSACTION</u>
NINE	March 14, 2005	Withdrawal of \$70,000 from GPGW checking account at U.S. Bank to purchase three U.S. Bank official checks having numbers 504216529 (\$20,000), 504216530 (\$30,000), and 504216531 (\$20,000)
TEN	April 1, 2005	Withdrawal of \$25,000 from GPGW checking account at U.S. Bank to purchase two U.S. Bank official checks having numbers 504445088 (\$15,000) and 504445089 (\$10,000)
ELEVEN	May 3, 2005	Withdrawal of \$60,000 from GPGW checking account at U.S. Bank to purchase U.S. Bank official check number 504445254 (\$60,000)

In violation of Title 18, United States Code, Sections 1957 and 2.

COUNTS TWELVE - SIXTEEN

The Grand Jury further charges:

1. The Grand Jury realleges and incorporates by reference herein paragraphs 1 through 36 of Count One.
2. In or around December 2004, **HENRY ALLEN** held a meeting with an individual referred to herein as "EM" in East St. Louis, Illinois, during which time **HENRY ALLEN** falsely and fraudulently represented that GPGW would pay 600% returns based on business that included a high turnover of real estate investments. **HENRY ALLEN** also falsely and fraudulently represented that GPGW never missed a payout to investors.
3. On or about December 28, 2004, EM met with **HENRY ALLEN** and **ANDRE MITCHELL** at GPGW's office on Lindell, in St. Louis, within the Eastern District of Missouri, during which time **ANDRE MITCHELL** falsely and fraudulently represented the status of GPGW investment properties in St. Louis and Atlanta.
4. Based on false and fraudulent representations of **ANDRE MITCHELL** and **HENRY ALLEN**, on or about December 28, 2004, EM delivered two personal checks, numbers 1027 and 1034, totally approximately \$20,000, to **HENRY ALLEN** to invest in GPGW, and was given two GPGW promissory notes, signed by **HENRY ALLEN**.
5. Based on false and fraudulent representations of **ANDRE MITCHELL** and **HENRY ALLEN**, between in or around February 2005, and continuing until in or around June 2005, **HENRY ALLEN** traveled from St. Louis, Missouri, within the Eastern District of Missouri, to Illinois, to meet with EM and to receive investment payments from EM, typically in the form of personal checks. Upon receipt of said payments, **ANDRE MITCHELL** and **HENRY ALLEN** provided EM with promissory notes.

6. As part of the scheme to defraud, after receiving payments from EM in Illinois, **HENRY ALLEN** would return to the Eastern District of Missouri with such payments and caused the deposit of EM's payments into GPGW account number 1-523-0285-7700 at a U.S. Bank branch located near GPGW's offices in St. Louis, Missouri.

7. On or about the dates listed below, within the Eastern District of Missouri and elsewhere,

**ANDRE MITCHELL, and
HENRY ALLEN,**

defendants herein, did knowingly and intentionally transport and cause to be transported in interstate commerce from Illinois to St. Louis, Missouri, for deposit into GPGW account number 1-523-0285-7700 at U.S. Bank, money and property having a value of \$5,000.00 or more, knowing said money or property to have been stolen, converted, and taken by fraud, namely the following personal checks drawn on the account of EM:

<u>COUNT</u>	<u>DATE</u>	<u>PROPERTY</u>
TWELVE	February 11, 2005	EM check number 1050, in the amount of \$15,000.00, payable to GPGW Ent.
THIRTEEN	April 1, 2005	EM check number 1068, in the amount of \$5,000.00, payable to GPGW.
FOURTEEN	April 1, 2005	EM check number 1070, in the amount of \$102,000.00, payable to GPGW.
FIFTEEN	May 6, 2005	EM check number 1099, in the amount of \$100,000.00, payable to GPGW.
SIXTEEN	June 22, 2005	EM check number 1127, in the amount of \$30,000.00, payable to GPGW Investments.

In violation of Title 18, United States Code, Sections 2314 and 2.

COUNT SEVENTEEN

The Grand Jury further charges:

1. The Grand Jury realleges and incorporates by reference herein paragraphs 1 through 36 of Count One.
2. The Grand Jury realleges and incorporates by reference herein paragraphs 2 through 6 of Count Twelve.
3. On or about December 28, 2004, within the Eastern District of Missouri and elsewhere,

**ANDRE MITCHELL, and
HENRY ALLEN,**

defendants herein, having devised and intended to devise a scheme and artifice to defraud and to obtain money and property having a value in excess of \$5,000.00 and to obtain such money and property by means of material false and fraudulent pretenses, representations, and promises, did induce and cause EM to travel in interstate commerce from Illinois to GPGW offices in St. Louis, Missouri, in the execution and concealment of the scheme and artifice to defraud, namely the delivery of EM of personal check numbers 1027 and 1034, which had a combined value of approximately \$20,000.

In violation of Title 18, United States Code, Sections 2314 and 2.

COUNT EIGHTEEN

The Grand Jury further charges:

1. The Grand Jury realleges and incorporates by reference herein paragraphs 1 through 36 of Count One.

2. In or around December 2004, an individual referred to herein as "BM" received a copy of a GPGW Private Investment Offering.

3. On or about December 2, 2004, based on promises and representations of **ANDRE MITCHELL**, an individual referred to herein as "AW" purchased three cashier's checks, for \$5,000 each, and hand delivered the three cashier's checks to **ANDRE MITCHELL**.

4. As part of the scheme to defraud, on or about December 2, 2004, the three \$5,000 cashier's checks delivered by AW were deposited and caused to be deposited into a GPGW account at NetBank (account # 16000029781). After these deposits, on or about December 3, 2004, **ANDRE MITCHELL** transferred and caused to be transferred approximately \$18,500 from NetBank account # 16000029781 to a personal account at Scott Credit Union.

5. On or about December 16, 2004, based on promises and representations of **ANDRE MITCHELL**, BM transferred approximately \$2,000 to GPGW NetBank account # 16000029781.

6. As part of the scheme to defraud, in or around late 2004, **ANDRE MITCHELL** falsely and fraudulently represented to an individual referred to herein as "SJ" that if she invested in GPGW, her investment would be secure and insured.

7. On or about January 3, 2005, based on representations and promises of **ANDRE MITCHELL**, SJ transferred approximately \$5,000 to GPGW NetBank account # 16000029781.

8. On or about January 13, 2005, based on representations and promises of **ANDRE MITCHELL**, SJ transferred approximately \$35,000 to GPGW NetBank account # 16000029781.

9. On or about January 14, 2005, based on representations and promises of **ANDRE MITCHELL**, BM transferred approximately \$2,000 to GPGW NetBank account # 16000029781.

10. As part of the scheme to defraud, upon receiving investment funds, **ANDRE MITCHELL** and **HENRY ALLEN** delivered and caused to be delivered promissory notes.

MAIL FRAUD

11. On or about February 15, 2005, in the Eastern District of Missouri and elsewhere,

**ANDRE MITCHELL, and
HENRY ALLEN,**

defendants herein, having voluntarily and intentionally participated in a scheme to defraud and to obtain money by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing this scheme and in attempting to do so, did knowingly send and cause to be sent and delivered by the United States Postal Service from St. Louis, Missouri, to BM in Georgia, a promissory note which identified the borrower as both GPGW and Global Wealth Investments (GWIZ).

In violation of Title 18, United States Code, Sections 1341 and 2.

COUNT NINETEEN

The Grand Jury further charges:

1. The Grand Jury realleges and incorporates by reference herein paragraphs 1 through 36 of Count One.

2. Mercy Seat Ministries is a church located in the area of Ft. Walton Beach, Florida.

3. As part of the scheme to defraud, **ANDRE MITCHELL** traveled to Florida and spoke at Mercy Seat Ministries. **ANDRE MITCHELL** falsely and fraudulently represented the real estate activities of GPGW.

4. On or about April 25, 2005, based on the promises and representations of **ANDRE MITCHELL**, an individual referred to herein as "TG" invested and caused to be invested on behalf of himself and Mercy Seat Ministries, approximately \$15,000. TG was falsely and fraudulently promised a 600% return in six months.

5. As part of the scheme to defraud, on or about April 25, 2005, the \$15,000 investment of TG and Mercy Seat Ministries was deposited into GPGW NetBank account # 16000029781.

6. As part of the scheme to defraud, on or about April 26, 2005, **ANDRE MITCHELL** transferred and caused to be transferred approximately \$11,250 from NetBank account number 16000029781 to a personal checking account (number 021-6505-8) at USAA Federal Savings Bank.

7. As part of the scheme to defraud, upon receiving investment funds, **ANDRE MITCHELL** and **HENRY ALLEN** delivered and caused to be delivered promissory notes.

MAIL FRAUD

8. On April 13, 2005, in the Eastern District of Missouri and elsewhere,

**ANDRE MITCHELL, and
HENRY ALLEN, and**

defendants herein, having voluntarily and intentionally participated in a scheme to defraud and to obtain money by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing this scheme and in attempting to do so, did knowingly

send and cause to be sent and delivered by the United States Postal Service from St. Louis, Missouri, to TG in Florida, a promissory notes which identified the borrower as both GPGW and Global Wealth Investments (GWIZ).

In violation of Title 18, United States Code, Sections 1341 and 2.

A TRUE BILL.

FOREPERSON

CATHERINE L. HANAWAY
United States Attorney

JOHN M. BODENHAUSEN
Assistant United States Attorney